ATTACHMENT II-10

PLAN FOR CONTROLLING WIND DISPERSAL

1. PURPOSE

This plan shall provide for the minimization of potential offsite windblown dispersal of dust from waste disposed at the Permittee's Facility.

2. GENERAL REQUIREMENT

Whenever average wind velocities exceed 35 miles per hour or upon notice from the Site Manager, Site Radiation Safety Officer or Corporate Radiation Safety Officer, the Permittee shall cease loading, hauling, and disposing of bulk or open containers of wastes. This requirement shall prevent the dispersion of dust from hauling and disposal operations at the Permittee's facility to offsite locations.

3. DUST SUPPRESSION FOR FACILITY ROADS

Water or other dust suppressing materials such as magnesium chloride brine solution ($MgCl_2$ [aq]) shall be placed on facility dirt roads on an as-needed basis for dust control. If magnesium chloride brine solution is used, the solution shall be applied in accordance with manufacturer's specifications. Records of dust suppressing materials applications shall be kept in the Operating Record.

4. DUST SUPPRESSION FOR MIXED WASTE LANDFILL CELL

In the construction areas of the Mixed Waste Landfill Cell during the process of placing and moving waste, the Permittee shall minimize dust created by these operations through the use of water or other dust suppressing materials on an as-needed basis. The use of water shall moisten the waste materials causing the waste to bond together, helping to prevent airborne dispersal.

5. POLYMER APPLICATION

On a bi-weekly basis (once every two weeks) beginning May 31st and ending October 1st, the Permittee shall spray a polymer solution on exposed areas of waste within the Mixed Waste Landfill Cell that have been disturbed in the previous two weeks. For a dust suppression agent, the Permittee shall apply a polymer-based stabilizer in accordance with the manufacturer's specification.

Should polymer application not be required due to frozen material or wet weather conditions such that the application of polymer would be of no tangible benefit, the Vice President of Operations in concurrence with the Senior Vice President of Compliance and Permitting (or their designees) may grant a written waiver or extension for polymer application.

The Permittee shall document the application of polymer to the Mixed Waste Landfill Cell in the Operating Record.

6. DEBRIS

a. When waste is comprised of debris, the material shall be blended with fill material. The blending shall provide security for the exposed materials and shall be equivalent to covering the waste with six inches of soil. After the blending has been completed, the lift area shall be visually inspected for the presence of dispersable debris. If dispersable debris is visible, the debris shall be covered with a sufficient quantity of additional soil to secure the dispersable debris prior to the end of the work day.

b. Lift areas containing any other materials susceptible to wind dispersal shall be covered with soil-like waste or clean fill material so that exposed materials susceptible to wind dispersal shall be secured by the end of each working day.

c. Side slopes shall be covered with soil-like waste or clean fill material so that debris susceptible to wind dispersal shall be secured.

7. INSPECTION

A daily inspection of all exposed areas of the Mixed Waste Landfill Cell shall be performed to look for plastic and other items that may become airborne. Such material shall be returned to the appropriate management unit.

8. WIND DISPERSAL MONITORING

In addition to the above control measures, the Permittee shall perform wind dispersal monitoring. The purpose of wind dispersal monitoring shall be to measure the extent of windblown metallic, PCB, and organic hazardous constituents released to adjacent properties that are shown in Figure 1 of this plan.

a. Wind-blown constituent monitoring shall be conducted by analyzing samples from adjoining properties for the following parameters:

i. total lead,

ii. PCBs,
iii. and total organic halides (TOX).

b. The Permittee shall sample all adjacent properties within one-half mile of the facility provided that permission can be obtained from the property owners.

i. The properties shall be sampled and analyzed once every three years at a sampling frequency of one sample for every 100 acres.

ii. The adjacent properties shall be divided into lots of approximately 100 acres. The Permittee shall use its best efforts to choose the lots in such a manner that they are approximately square. However, this shall be heavily dependent upon the size and shape of the area to be sampled.

iii. The sampling location shall be chosen on a random basis and documented in reference to Figure 1 of this plan.

iv. Care shall be taken to exclude vegetation and animal waste.

v. The sample shall be taken from the top three inches of soil.

vi. All samples shall be placed in clean containers.

vii. The samples shall be handled and preserved in accordance with the instructions provided by the laboratory doing the analysis.

c. The results of sampling and analysis shall be compared to the results of background samples. The background samples shall be taken at the time of sample collection from locations at least two miles from the site. At least two background samples shall be taken at the time the adjacent property is sampled and shall be taken in the same manner as the adjacent property samples.

d The Permittee shall document compliance with this plan in the Operating Record.

FIGURE 1
ADJACENT PROPERTIES